

May 31, 2016

**VIA myIBFS**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, DC 20554

**Re: *In the Matter of GigSky, Inc., Petition for Declaratory Ruling Under Section 310(b)(4) of the Communications Act, as amended***  
**(File No. ISP-PDR-20160415-00008)**

Dear Ms. Dortch:

GigSky, Inc. ("GigSky," or "Petitioner"), by its undersigned counsel and pursuant to Commission Staff request, hereby amends and clarifies its petition in the above-matter ("Petition") with regards to the individuals and entities for which it requests specific and advance approval of foreign indirect ownership interests in FCC wireless licenses, WQJZ324 and WQJZ325 (the "Wireless Licenses") pursuant to 47 C.F.R. §§ 1.991(i) and (j), and 47 C.F.R. § 1.991(k), respectively. For the Commission's convenience, additional information is included below together with the information originally provided in the Petition.

GigSky states as follows:

**G. Ownership Information (47 C.F.R. § 1.991(g)):**

As a result of the proposed transaction at issue in the Petition ("Proposed Transaction"), the following entities and individuals will hold a ten percent or greater ownership interest in GigSky Mobile:

<b>Name:</b>	GigSky, Inc.
<b>Address:</b>	2390 El Camino Real, Suite 250 Palo Alto, CA 94306
<b>Principal Business:</b>	Telecommunications
<b>Citizenship:</b>	United States
<b>Ownership Interest:</b>	100%

As a result of the Proposed Transaction, the following entities and individuals will hold a ten percent or greater ownership interest in the GigSky:

**Name:** Ravi Rishy-Maharaj  
**Address:** 2390 El Camino Real, Suite 250  
Palo Alto, CA 94306  
**Principal Business:** Individual  
**Citizenship:** Canada  
**Ownership Percentage:** 37.26%

Mr. Rishy-Maharaj holds a 32.785% direct, individual interest in GigSky, and additionally a 4.475% indirect ownership interest in GigSky, through his ownership of Kinaare Networks Corporation.

**Name:** Takekazu Kishimoto  
**Address:** 3-3-7 Fushimimachi, Chuo-ku,  
Osaka, 541-8513, Japan  
**Principal Business:** Individual  
**Citizenship:** Japan  
**Ownership Percentage:** 13.184%

Mr. Kishimoto's interest in the wireless licenses exists through a combination of a direct, individual interest in GigSky (7.276% post-transaction), and his majority ownership and actual control of Kisco Ltd. ("Kisco") as President. Kisco will have a 5.908% interest in GigSky following the Proposed Transaction. Accordingly, due to a combination of Mr. Kishimoto's direct interest in GigSky and through his interest in Kisco, Mr. Kishimoto's aggregate foreign indirect ownership interest in the Wireless Licenses will increase from 2.637% prior to the transaction, to 13.184% as a result of the transaction.

**J. Requests for Specific Approval (47 C.F.R. §§ 1.991(i) and (j)):**

**1. Ravi Rishy-Maharaj:**

Petitioner requests specific approval of the increase in the foreign indirect ownership of Mr. Rishy-Maharaj, a Canadian citizen, in the Wireless Licenses, from 6.557% prior to the transaction, to 37.26% following the transaction.

**2. Takekazu Kishimoto:**

Petitioner requests specific approval of the increase in the foreign indirect ownership of Mr. Kishimoto, a Japanese citizen, in the Wireless Licenses, from 2.637% to 13.184%.

**3. Kisco Ltd.:**

Petitioner requests specific approval of the increase in the foreign indirect ownership of Kisco in the Wireless Licenses, from 1.182% to 5.908%. Kisco is a Japanese Limited Company with its principal place of business at 3-3-7 Fushimimachi, Chuo-ku, Osaka, 541-8513, Japan. The company's principal business is the manufacture and sale of a wide array of productions including: pharmaceuticals, chemicals, food products, medical devices, building materials, and semiconductor and other electronic devices.

As stated above, Mr. Kishimoto maintains majority ownership and actual control of Kisco as President.

**K. Requests for Advance Approval (47 C.F.R. § 1.991(k)):**

GigSky does not seek additional advance approval other than the request in its Petition for Mr. Ravi Rishy-Maharaj to increase his indirect ownership interests in the Wireless Licenses up to a non-controlling 49.99%.

Should you have any questions regarding this letter, please contact the undersigned.

Respectfully submitted,



Michael P. Donahue

*Counsel for GigSky, Inc.*

cc: Susan O'Connell (via email)  
Gabrielle Kim (via email)